

Fw: Review of Wetlands Report for Cement Creek-final comments

Maple Barnard to: Sabrina Forrest

01/25/2012 03:01 PM

From: Maple Barnard/R8/USEPA/US

To:

----- Forwarded by Maple Barnard/R8/USEPA/US on 01/25/2012 02:59 PM -----

From: "Hayhurst, Barry" <barry.hayhurst@urs.com>

To: "Hall, Susan" <susan.hall@urs.com>, Maple Barnard/R8/USEPA/US@EPA

Date: 01/09/2012 02:38 PM

Subject: Review of Wetlands Report for Cement Creek-final comments

I'm so happy to see this so close to being ready to use.

I have tried not to make a lot of petty comments, but to focus on the major issue.

My major comment is to make sure it is completely clear that only the 40 CFR 230.3 criteria were used to identify HRS qualifying wetlands for this study. Additional delineation tools were employed to amplify the work and make the delineation effort relevant to potential future work in the Cement Creek drainage, but all wetlands identified in this report were solely identified as wetlands because they meet the 40 CFR 230.3 vegetation criteria specified in the HRS rule. All of the other traditional tools/criteria don't really matter for this job. Listing the plant species observed would be the most persuasive evidence.

The scope of the task was not to determine what influences the streamside wetlands, but to merely identify the streamside wetlands according to 40 CFR 230.3 criteria and then to measure the streamside length on both sides of the stream. There is no funding or mandate for interpretation of the observations. Sorry, but the HRS rule (the law) determines that the streamside wetlands by legal definition are influenced by the observed contamination in Cement Creek. The rule does not require an interpretation of percent influence.

The HRS was written by Congress so it is not a scientific or engineering document, just the law. It is sometimes counterintuitive to a scientist's or engineer's training. All you have to do is identify HRS qualifying wetlands and measure their streamside length.

The T&E species and non-wetland environments parts look good.

Also "Project Area", "Project", and "Study Area" are used interchangeably----I personally prefer "Study Area".

URS took away our company cell phones and required that we get individual new smart phones for company business so my new personal cell phone number is 303-345-3151. I won't always carry it with me (gym, yoga, cycling, etc.) because I can't afford to lose it, but I will try to keep it with me this week. This week I have classes on Tuesday (6:00-8:00pm), Wednesday (5:45-7:15pm) and Thursday (7:30 to 9:00 pm) so the phone will be turned off then.

Thanks.

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